IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

KATERI LYNNE DAHL,
Plaintiff,

*

VS.

CASE NO.

CHIEF KARL TURNER, in his individual capacity only; OFFICER JOHN DOES 1-3, in their individual capacities only; and CITY OF JOHNSON CITY,

Defendants.

2:22-CV-00072-KAC-CRW

DEPOSITION OF

KEVIN PETERS

(Taken December 19, 2023)

APPEARANCES:

COUNSEL FOR THE PLAINTIFF:

HUGH A. EASTWOOD

Attorney at Law

7911 Forsyth Blvd., Ste. 300 St. Louis, MO 63105-3825

ALEXIS I. TAHINCI TAHINCI LAW FIRM

105 Ford Avenue, Ste. 3 Kingsport, TN 37663

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- they told him there was going to be a meeting.
- Q. Was this unusual, in your experience, to have a meeting with TBI about a case like this?
 - A. It was unusual in the fact that we hadn't been notified.

 They were meeting about one of our cases and we were not notified, so I would say that is unusual.
- 7 Q. What would the normal notification process look like?
- A. They would talk to somebody at our department and let us know.
- 10 Q. But you found out from Will Saulsbury, right?
- 11 | A. Correct.

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- 12 Q. So what -- how did Will Saulsbury find out?
- A. He was at the TBI, I think, discussing another case with agents, and somebody had informed him.
- 15 | Q. So wouldn't that be notification to JCPD?
- 16 A. Not to just an officer like that. They should notify a supervisor.
- Q. Okay. Would it typically be a lieutenant, or sergeant, or captain, or the chief?
- 20 A. It could have been anybody. I mean, it could be sergeant up.
- Q. What was Chief Turner's reaction when you told him about this meeting?
- 24 A. He said he hadn't heard of any meeting.
- 25 | Q. Okay.

KEVIN PETERS

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- 1 A. And he instructed me to find out what was going on.
- 2 | Q. Did he seem upset about the meeting?
- 3 A. No.
- 4 Q. Okay. Did he seem to share your view that it was unusual?
- 5 A. Yes.
- Q. Did he ask you to do anything other than to find out what was going on?
- 8 A. Just contact the TBI and see what the meeting was about.
- 9 Q. What did you do next?
- 10 A. I made contact with someone at the TBI.
- 11 Q. Okay. Do you recall when that was?
- 12 A. It would have been after that E-mail.
- 13 | Q. Okay.
- 14 A. I don't -- again, I don't know the dates and times frames
 15 because I don't have that information in front of me.
- 16 Q. But shortly after, hours or days, not weeks or months?
- 17 A. Correct.
- 18 Q. Okay. And what happened next?
- 19 A. I met with one of the supervisors at the TBI. We
- 20 discussed what this meeting was supposed to be about.
- 21 That supervisor advised me that they were kind of in the
- 22 dark, too, that they had received a call from the U.S.
- 23 Attorney General's Office concerning investigation into
- 24 sexual assaults that they didn't have jurisdiction over.
- 25 | Q. The TBI can -- sorry, the TBI can investigate sexual

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<u>CERTIFICATE</u>

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of KEVIN PETERS was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 3rd day of January, 2024.

CCA L. OURT

Rebecca Overbey
LICENSED COURT REPORTER
State of Tennessee
LCR #078

My License Expires:

June 30, 2024

CERTIFIED ONLY IF AFFIXED SEAL IS GREEN